REMARKS/ARGUMENTS

Re-examination and favorable reconsideration in light of the above amendments and the following comments are respectfully requested.

Claims 9 - 13, 15, and 16 are pending in the application. Currently, all claims stand rejected.

By the present amendment, claims 9 and 16 have been amended; and claim 15 has been cancelled without prejudice.

In the office action mailed August 13, 2010, the Examiner objected to Figs. 3 and 4 of the drawings. By the present amendment, Figs. 3 and 4 have been cancelled and the specification has been amended to delete any mention of these figures.

Further in said office action, the Examiner objected to claims 15 and 16. The objection to claim 15 is moot in view of the cancellation of the claim. Appropriate correction has been made to claim 16.

Claims 9 - 13, 15, and 16 were rejected under 35 U.S.C. 112, second paragraph. This rejection is believed to be moot in view of the amendments to claim 9.

Claims 9 - 13 and 15 - 16 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,353,768 to Karafillis. This rejection is traversed by the instant response.

Claim 9 as amended herein is directed to a method for the numerical simulation of a pressing process comprising the steps consisting of: recording at least one meta-model formed by a supervisor consisting of a permanent collection of numerical representations of elementary constituents of pressing tools, each of the elementary constituents being defined in the form of finite elements, and comprising numerical static attributes,

creating a macro command by a user comprising: recording a
numerical model of deformation of a blank used in the process to
be simulated, selecting a subset of the permanent collection,
for temporary recording of elementary constituents representing
a particular pressing tool corresponding to a simulation in
question, the subset constituting a specific collection in the
form of digitized finite elements, parameterizing the digitized
finite elements of the specific collection, as well as the
corresponding attributes according to characteristics of the
process to be simulated, recording numerical information
representing relative movements of components of the specific
collection, according to operating cycles of the pressing
process to be simulated, compiling the macro command in
supervisor mode comprising: recalculating numerical models of
deformation of the blank according to numerical information
recorded in the parameterized specific collection, the numerical
model of the blank, and specific movements, and generating a
numerical or visual representation of the deformations of the
blank by the application of the recalculated numerical model,
wherein the step of forming the specific collection further
comprises displaying a graphical interface and recording
information captured from the graphical interface and the step
of displaying a graphical interface comprises personalizing a
prerecorded interface taking into account information from steps
(a) and (b).

    As previously noted in Applicants' prior response,
Karafillis does not teach that the step of forming the specific
collection further comprises displaying a graphical interface
and recording information captured from the graphical interface
and the step of displaying a graphical interface comprises
personalizing a prerecorded interface taking into account

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information from steps (a) and (b). Such characteristics have the effect of allowing the user to define the modeling process of drawing by making a limited number of parameters. See page 3, line 33 to page 4, line 5; and page 7, lines 12 - 13 of the instant specification.

Starting from Karafillis, it appears that the technical problem to solve is to improve the configuration tool of a process of modeling a drawing. In order to resolve the above cited technical problem, the skilled person, starting from the process described in Karafillis and his general knowledge, would not have been inclined to modify the teaching of Karafillis to obtain the solution according to the present invention. Indeed Karafillis does not teach a mechanism to customize a configuration interface model thereby giving the invention a decisive advantage to allow the user to be faster and more efficient. In addition, Karafillis aims to limit human intervention in such a process modeling (see col. 1, lines 60 - 64).

With regard to the Examiner's comments in paragraph 10.1, the Examiner has made an insufficient showing to establish inherency. Inherency requires more than mere possibilities and mere probabilities. Inherency requires that the Examiner produce extrinsic evidence which shows that the missing written material is necessarily present in Karafillis and would so be recognized by one of ordinary skill in the art. Claim 9 as amended does set forth a specific method of personalization - namely one that takes into account information from steps (a) and (b) of the method. There is no disclosure in Karafillis of any such personalization being performed.

For these reasons, claim 9 is allowable over Karafillis.

Claims 10 - 13 and 16 are allowable for the same reasons as

claim 9 as well as on their own accord.

The instant application is believed to be in condition for allowance, such allowance is respectfully solicited.

The instant amendment should be entered since the only substantive amendment to claim 9 is the addition of the subject matter from now cancelled claim 15. Thus, the amendment does not require any new search and/or consideration on the part of the Examiner and does not raise any issue of new matter.

Should the Examiner believe an additional amendment is needed to place the case in condition for allowance, he is hereby invited to contact Applicants' attorney at the telephone number listed below.

A notice of appeal is appended hereto. The Director is hereby authorized to charge the notice of appeal fee in the amount of $540.00 to Deposit Account No. 02-0184.

A request for extension of time is enclosed herewith. The Director is hereby authorized the extension of time fee in the amount of $1,110.00 to Deposit Account No. 02-0184.

If any additional fees are required in connection with this case, it is respectfully requested that they be charged to Deposit Account No. 02-0184.

                          Respectfully submitted,

                          Faycal Mehrez et al.

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